

EXHIBIT B

From: [Anastasia P. Boden](#)
To: [Erin Wilcox](#); [Stephens, Ben](#); [Gomez, Sandy](#); [Dillard, Jarett](#); lori.yount@houstontx.gov; [Eckert, Darah - LGL](#)
Cc: [Joshua P. Thompson](#); [Katherine Turnbull](#); bsileo@hhstxlaw.com; bharris@hhstxlaw.com
Subject: Re: Landscape Consultants, et al. v. City of Houston, et al., 4:23-cv-03516
Date: Thursday, September 12, 2024 4:35:51 PM
Attachments: [image001.png](#)
[image002.png](#)

[EXTERNAL EMAIL]

Hi Ben and team,

I'm circling back to confirm your availability for the 30(b)(6) deposition we noticed for September 30th.

On our end, Mr. Thompson is available for both his own and a 30(b)(6) deposition through the end of the discovery period excluding September 17, 26, 27, or 30.

Best,

Anastasia

Anastasia P. Boden | Senior Attorney
Pacific Legal Foundation
555 Capitol Mall, Suite 1290 | Sacramento, CA 95814
916.419.7111 | Office



**PACIFIC LEGAL
FOUNDATION**

Defending Liberty and Justice for All.

From: Erin Wilcox <EWilcox@pacificlegal.org>
Date: Friday, August 30, 2024 at 12:03 PM
To: Stephens, Ben <Ben.Stephens@huschblackwell.com>, Gomez, Sandy <Sandy.Gomez@huschblackwell.com>, Dillard, Jarett <Jarett.Dillard@huschblackwell.com>, lori.yount@houstontx.gov <lori.yount@houstontx.gov>, Eckert, Darah - LGL <Darah.Eckert@houstontx.gov>
Cc: Joshua P. Thompson <JThompson@pacificlegal.org>, Anastasia P. Boden <ABoden@pacificlegal.org>, Katherine Turnbull <KTurnbill@pacificlegal.org>, bsileo@hhstxlaw.com <bsileo@hhstxlaw.com>, bharris@hhstxlaw.com <bharris@hhstxlaw.com>
Subject: RE: Landscape Consultants, et al. v. City of Houston, et al., 4:23-cv-03516

Thanks Ben, we'll circle back to you on Plaintiffs' deposition availability.

Additionally, attached please find Plaintiffs' second set of requests for production of documents.

Best,
Erin

Erin Wilcox | Attorney

Pacific Legal Foundation
555 Capitol Mall, Suite 1290 | Sacramento, CA 95814
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**PACIFIC LEGAL
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From: Stephens, Ben <Ben.Stephens@huschblackwell.com>

Sent: Wednesday, August 28, 2024 9:46 AM

To: Erin Wilcox <EWilcox@pacificlegal.org>; Gomez, Sandy <Sandy.Gomez@huschblackwell.com>; Dillard, Jarett <Jarett.Dillard@huschblackwell.com>; lori.yount@houstontx.gov; Eckert, Darah - LGL <Darah.Eckert@houstontx.gov>

Cc: Joshua P. Thompson <JThompson@pacificlegal.org>; Anastasia P. Boden <ABoden@pacificlegal.org>; Katherine Turnbull <KTurnbill@pacificlegal.org>; bsileo@hhstxlaw.com; bharris@hhstxlaw.com

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Erin, we'll consult and let you know on dates. Please also let us know available dates in the second half of September for a corporate representative of Lanscape, a corporate representative of Metropolitan, and Mr. Thompson individually. Thanks.

Ben Stephens

Partner

Direct: 713-525-6263
Mobile: 915-525-2431
Ben.Stephens@huschblackwell.com

From: Erin Wilcox <EWilcox@pacificlegal.org>

Sent: Wednesday, August 28, 2024 9:41 AM

To: Stephens, Ben <Ben.Stephens@huschblackwell.com>; Gomez, Sandy <Sandy.Gomez@huschblackwell.com>; Dillard, Jarett <Jarett.Dillard@huschblackwell.com>; lori.yount@houstontx.gov <lori.yount@houstontx.gov>; Eckert, Darah - LGL <Darah.Eckert@houstontx.gov>

Cc: Joshua P. Thompson <JThompson@pacificlegal.org>; Anastasia P. Boden <ABoden@pacificlegal.org>; Katherine Turnbull <KTurnbill@pacificlegal.org>; bsileo@hhstxlaw.com <bsileo@hhstxlaw.com>; bharris@hhstxlaw.com <bharris@hhstxlaw.com>

Subject: Landscape Consultants, et al. v. City of Houston, et al., 4:23-cv-03516

[EXTERNAL EMAIL]

Dear Ben and team,

Attached, please find a 30(b)(6) deposition notice directed to your client and the protective order applicable to this deposition. We've noticed the deposition for Monday, September 30 at Husch Blackwell's offices, but are happy to coordinate with you on a different date and/or location that is convenient for all parties and witnesses.

I'll be out of the office from September 2-13, so Joshua or Anastasia will work with you on any details while I'm away.

Best,
Erin

Erin Wilcox | Attorney

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